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Attorneys for Defendant and
Counterclaim-Plaintiff
CHIPMOS TECHNOLOGIES, INC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

Case No. C-09-03689-JF-RS

**STIPULATED REQUEST AND
[PROPOSED] ORDER TO EXTEND
TIME FOR EXPERT DISCOVERY**

Date: N/A
Time: N/A
Courtroom: 3, 5th Floor
Judge: Hon. Jeremy Fogel

19 Pursuant to Local Rule 6-2, Plaintiff Freescale Semiconductor, Inc. (“Freescale”) and
20 Defendant ChipMOS Technologies, Inc. (“ChipMOS,” and together with Freescale, the “Parties”)
21 jointly submit this stipulated request to extend time for expert discovery.

22 The April 1, 2011 Joint Scheduling Order set an expert discovery cut-off date of June 17,
23 2011. *See* ECF No. 72. Freescale's expert Dr. Robert G. Harris will be out of the country and
24 thus unavailable for deposition through June 19, 2011. Accordingly, the parties have agreed to
25 schedule Dr. Harris's deposition for June 29, 2011. The Parties jointly request that the date for
26 the close of expert discovery be extended to June 29, 2011, for the limited purpose of allowing
27 Dr. Harris's deposition to be taken.

28 This request for an extension is supported by the Declaration of Greg L. Lippetz, filed

1 concurrently herewith.

2 **IT IS SO STIPULATED.**

3 Dated: June 7, 2011

JONES DAY

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By: /s/ Greg L. Lippetz
Greg L. Lippetz

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Counsel for Plaintiff
FREESCALE SEMICONDUCTOR, INC.

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In accordance with General Order No. 45, Section X(B), the above signatory attests that

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Concurrence in the filing of this document has been obtained from the signatory below.

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Dated: June 7, 2011

COOLEY LLP

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By: /s/ Ronald S. Lemieux
Ronald S. Lemieux

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Counsel for Defendant
CHIPMOS TECHNOLOGIES, INC.

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IT IS SO ORDERED.

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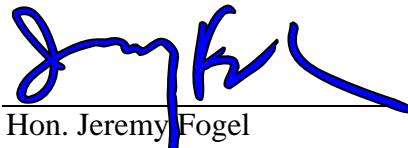
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DATED: 6/8/11

By: 
Hon. Jeremy Fogel

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